

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**COALITION PLAINTIFFS' NOTICE OF FILING DISCOVERY TOPICS
TO COMPLETE BEFORE SUMMARY JUDGMENT OR TRIAL**

Pursuant to this Court's request (June 7, 2022 Tr at 63:1-5), Coalition Plaintiffs hereby informs the Court of the remaining discovery (in addition to the items discussed at the conference) to be completed before summary judgment briefing or trial. Coalition Plaintiffs hereby join Curling Plaintiffs' list of discovery requirements (Doc. 1400), with the following additions and clarifications:

1. Discovery regarding potential access to Georgia's voting system components (Curling item 1.) may require depositions beyond those identified in the filed Notices of Intent to Serve Subpoenas (Doc. 1399), if

additional essential witnesses are identified during these depositions.

Plaintiffs will supplement after the noticed depositions have been conducted.

2. Plaintiffs may require inspection of an appropriate sample size of original paper ballots to assist experts in the determination of the underlying cause of systemic double and triple counting in the official tabulations in some elections, as well as examination of previously requested EMS servers.
3. Discovery regarding the security, reliability, and accuracy of voting system components (scanners and PollPads) for which discovery has not yet been available, because of the pending 11th Circuit appeal.

Dated: June 15, 2022

Respectfully submitted this 15th day of June, 2022.

/s/ Russell T. Abney

Russell T. Abney
Georgia Bar No. 000875
WATTS GUERRA, LLP
Suite 100
4 Dominion Drive, Building 3
San Antonio, TX 78257
(404) 670-0355

/s/ Robert A. McGuire, III

Robert A. McGuire, III
Admitted Pro Hac Vice
(ECF No. 125)
ROBERT MCGUIRE LAW FIRM
113 Cherry St. #86685
Seattle, Washington 98104-2205
(253) 267-8530

Counsel for Coalition for Good Governance

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DONNA CURLING, ET AL.,
Plaintiffs,

v.

BRAD RAFFENSPERGER, ET AL.,
Defendants.

Civil Action No. 1:17-CV-2989-AT

CERTIFICATE OF SERVICE AND COMPLIANCE

I hereby certify that on June 15, 2022, a copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record. In addition, pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ Russell T. Abney
Russell T. Abney